

Dear Sen. Gerratana, Rep. Johnson and Members of the Public Health Committee:

I am writing in opposition to HB 5537, Section 42 #6, which would expand the Scope of Practice of Speech Language Pathologists (SLP's) to include provision of Applied Behavior Analysis or "ABA".

I am an employer of both SLP's and Board Certified Behavior Analysts (BCBA's) and require the specific expertise that both of these professional disciplines contribute to the education of people with autism and other disabilities.

SLP's provide vital and unique services to people of all ages, with a wide variety of disabilities and medical conditions. However, their education, training, and practice does not include ABA. Likewise, BCBA's have a course of study, supervised experience, standardized testing, and an area of practice that is completely different than that of an SLP.

My organization requires the expertise of both, but these professions are completely different and this expansion of an SLP's Scope of Practice without any training or education in Behavior Analysis will not be in the best interests of the children of Connecticut who require ABA to make meaningful educational and therapeutic progress.

This expansion of an SLP's Scope of Practice would impinge on the Scopes of Practice of other professionals including BCBA's, School Psychologists, Physicians and Psychologists.

This expansion of an SLP's Scope of Practice would be contrary to several existing laws in Connecticut.

Public Act 09-115 states that insurance funding for ABA services must be provided or supervised by (i) a behavior analyst who is certified by the Behavior Analyst Certification Board, (ii) a licensed physician, or (iii) a licensed psychologist. Expanding an SLP's Scope of Practice would be contrary to this law.

CT General Statutes 10-76ii – Provision of ABA Services defines Behavior Analysis and the Scope of Practice of Behavior Analysts. The purpose of this statute was to ensure that ABA programs are overseen by individuals who are properly educated and trained when these services are publicly funded. An expansion of an SLP's Scope of Practice to include ABA would amend this statute to include individuals who do not have any training or education at all in the provision of ABA services.

Public Act 11-209, an Act Concerning the Department of Public Health's Oversight Responsibilities Relating to Scope of Practice Determinations for Health Care Professions established a process for submission and review of requests to revise an existing scope of practice or to establish a new scope of practice prior to consideration by the General Assembly. This request for an expansion of an SLP's Scope of Practice did not go through that required review process, and therefore should not be considered as a legislative action.

In addition to being a School Administrator and BCBA, I am also the parent of a son with autism. He has benefited from the expertise of both SLP's and BCBA's. But I know first hand as a parent that an SLP alone does not have the knowledge, experience or skill sets needed to design and implement an ABA program. Both parents and school districts will have a much more difficult time discerning who is truly qualified to provide these types of services in a meaningful way for their child if this provision is allowed to pass.

An expansion of an SLP's Scope of Practice to include ABA without concurrent inclusion of any education or experience requirements will mean that thousands of children will be deprived of the specific ABA expertise they need to implement their individualized special education plans (IEP's).

On the flip side, there is a chronic statewide shortage of SLP's in the state to meet the needs of our children in public schools. An expansion of an SLP's Scope of Practice will also mean that these important professionals are spread even thinner, and their valuable SLP training and expertise is compromised.

Yours truly,

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